IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re: : BANKRUPTCY NO. 15-11295TPA

DIANE CECILIA VAVRECK

Debtor : HON. THOMAS P. AGRESTI

:

J.P. MORGAN CHASE BANK,

Movant : CHAPTER 13

v. : RELATED TO CLAIM NO. 8

DIANE CECILIA VAVRECK; and RONDA J. : WINNECOUR, ESQUIRE, CHAPTER 13, :

Respondents :

DECLARATION

I hereby certify as counsel for the Debtor that the existing Chapter 13 Plan is adequately funded and that there is no need to file an amended Chapter 13 Plan.

Respectfully submitted,

QUINN, BUSECK, LEEMHUIS, TOOHEY & KROTO, INC.

By: /s/Michael S. JanJanin

Michael S. Jan Janin, Esq.

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CERTIFICATE OF SERVICE OF DECLARATION

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on July 14, 2016.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was:

Electronic Notification

Ronda Winnecour, Esquire, Chapter 13 Trustee

Via the CM/ECF system - cmecf@chapter13trusteewdpa.com

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification," and those served by mail will be listed under the heading "Service by First-Class Mail."

EXECUTED ON: July 14, 2016

By: /s/Michael S. JanJanin

Signature

Michael S. Jan Janin, Esq.

Typed Name

2222 W. Grandview Blvd., Erie, PA 16506-4508_

Address

(814) 833-2222 ext. 1045

Phone No.

PA ID #38880

List Bar I.D. and State of Admission